

UNITED STATES BANKRUPTCY COURT, NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

RE: YOLANDA JORDAN

) Case No. 18 B 30371
)
Debtor) Chapter 13
)
) Judge: JACQUELINE P COX

NOTICE OF MOTION

YOLANDA JORDAN

CUTLER & ASSOC
via Clerk's ECF noticing procedures

9302 S EGGLESTON AVE
CHICAGO, IL 60620

Please take notice that on February 04, 2019 at 10:30 am my designee or I will appear before the Honorable Judge JACQUELINE P COX at 219 South Dearborn Courtroom 680, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL or by the methods indicated on January 09, 2019.

/s/ Tom Vaughn

TRUSTEE'S MOTION TO DISMISS FOR UNREASONABLE DELAY

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On October 29, 2018 the Debtor filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. That the above-captioned plan has not yet been confirmed.
3. That the Debtor has caused unreasonable delay that is prejudicial to creditors by failing to:

Amend J for \$200/mo storage and the tax proration at \$511 per month and amend plan - #2 .3 - tax submit language.

WHEREFORE, the Trustee prays that this case be dismissed for unreasonable delay by the debtor pursuant to 11 U.S.C. § 1307 (c) (1).

Respectfully submitted,

TOM VAUGHN
CHAPTER 13 TRUSTEE
55 E. Monroe Street, Suite 3850
Chicago, IL 60603
(312) 294-5900

/s/ Tom Vaughn